

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

ZENIMAX MEDIA INC. and
ID SOFTWARE LLC,

Plaintiffs,

V.

OCULUS VR, LLC,
PALMER LUCKEY,
and FACEBOOK, INC.

Defendants.

CIVIL CASE NO. 3:14-cv-01849-P

JOINT MOTION FOR PREPARATION OF TRANSCRIPT

TO THE HONORABLE COURT:

Plaintiffs ZeniMax Media Inc. and id Software LLC and Defendants Oculus VR, LLC, Palmer Luckey and Facebook, Inc. (the “Parties”) file this motion requesting preparation of a transcript of the hearing held before Magistrate Judge Stickney on Monday, January 26, 2015, and in support, state the following:

1. On January 26, 2015, Magistrate Judge Stickney held a hearing on the following motions: (a) Plaintiffs’ Motion to Overrule Objections to Discovery and to Compel Defendants to Proceed with Discovery (Dkt. No. 40); (b) Plaintiffs’ Motion for Entry of an Order for the Protection of Confidential Information (Dkt. No. 42); (c) Defendants’ Motion to Quash and for Protective Order Re: Plaintiffs’ Subpoenas for Phone Records (Dkt. No. 54); and (d) Defendants’ Motion for Protective Order to Stay Discovery (Dkt. No. 55) (hereinafter, the “Proceedings”).

2. During the hearing, counsel for Plaintiffs requested that the proceedings be closed to the public.

3. The Court granted the request and ordered that the hearing be closed to the public.

4. The Parties have agreed that the transcript may be designated CONFIDENTIAL pursuant to the Protective Order (Dkt. No. 107).

5. The Parties reserve their rights to seek a higher level of confidentiality designation, or to seek to withdraw this designation, based on the content of the transcript when produced.

6. The parties are willing to bear the costs of preparing the transcript.

PRAYER

For the foregoing reasons, Plaintiffs and Defendants respectfully request that the Court direct the court reporter to prepare a transcript of the Proceedings, and that persons authorized under the Protective Order (Dkt. No. 107) be permitted to obtain a copy of such transcript upon payment of the usual fee.

Dated: February 13, 2015

Respectfully submitted,

/s/ Phillip B. Philbin

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*Attorneys for Oculus VR, LLC, Palmer Luckey
and Facebook, Inc.*

CERTIFICATE OF CONFERENCE

I hereby certify that from February 9, 2015–February 13, 2015, I conferred with Linda Stahl, counsel for Defendants in this matter, regarding the issues raised by this motion. This motion is unopposed. Defendants join in the motion.

Dated: February 13, 2015

/s/ Phillip B. Philbin

Phillip B. Philbin

CERTIFICATE OF SERVICE

On February 13, 2015, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case files system of the court. I hereby certify that I have served all counsel and/or pro se parties of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

Dated: February 13, 2015

/s/ Phillip B. Philbin

Phillip B. Philbin